

Jesse Merrithew, OSB No. 074564

Email: jesse@lmhlegal.com

Viktoria Lo, OSB No. 175487

Email: viktoria@lmhlegal.com

Levi Merrithew Horst PC

610 SW Alder Street, Suite 415

Portland, Oregon 97205

Telephone: (971) 229-1241

Juan C. Chavez, OSB No. 136428

Email: jchavez@ojrc.info

Brittney Plessner, OSB No. 154030

Email: bplessner@ojrc.info

Alex Meggitt, OSB No. 174131

Email: ameggitt@ojrc.info

Franz H. Bruggemeier, OSB No. 163533

Email: Fbruggemeier@ojrc.info

Oregon Justice Resource Center

PO Box 5248

Portland, OR 97208

Telephone: 503 944-2270

J. Ashlee Albies, OSB No. 051846

Email: ashlee@albiesstark.com

Whitney B. Stark, OSB No. 090350

Email: whitney@albiesstark.com

Maya Rinta, OSB No. 195058

Email: maya@albiesstark.com

Albies & Stark LLC

1 SW Columbia St. Suite 1850

Portland, Oregon 97204

Telephone: (503) 308-4770

Facsimile: (503) 427-9292

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

DON'T SHOOT PORTLAND, et al.

Plaintiffs

v.

CITY OF PORTLAND, a municipal
corporation,

Defendant.

Case No. 3:20-cv-00917-HZ

DECLARATION OF MURIEL LUCAS IN
SUPPORT OF PLAINTIFF'S MOTION FOR
CLASS CERTIFICATION
ORAL ARGUMENT REQUESTED

I, Muriel Lucas, declare as follows pursuant to 28 USC § 1746:

1. I have personal knowledge of the information contained in this declaration. If called upon to do so, I could and would competently testify regarding the matters set forth herein.
2. On August 21, 2020, I attended a Black Lives Matter protest near the Portland Police Bureau's North Precinct on Martin Luther King Jr Blvd at Northeast Killingsworth Street.
3. I believe there had been a march earlier from a nearby park, but I arrived a little later after the protest was already underway outside of PPB's North Precinct. There was a line of protesters on MLK Jr Blvd facing the precinct, and also some people on NE Emerson St, between the precinct and the Boys & Girls Club.
4. I would characterize the overall mood of the protesters that night as "apprehensive". The protests had been going on for nearly three months, and at that point PPB seemed to be just declaring riots instantly and then brutalizing people. Protesters had experienced a lot of indiscriminate violence from the police. Someone had a stereo system to play music on, and people were trying to lighten the mood, but I recall an atmosphere of apprehension and concern prevailing.

5. There were chants like "No Justice, No Peace" taking place among the protesters. I am a pretty shy person, so I didn't chant very much. I had an umbrella with me and I was there to show solidarity and to use the umbrella to help protect others and myself from munitions and gas.

6. It was difficult to tell how many PPB officers were present. There were usually only a few that I could see.

7. It seemed like the PPB officers were in the parking area, but they would occasionally come out and form a line of about two dozen officers in riot gear, before disappearing again.

8. At some point I believe somebody vandalized a PPB vehicle. I did not know anyone who was involved in the vandalism, nor did I myself participate in the vandalism.

9. There was a sudden police announcement ordering the protesters to disperse, which was accompanied immediately by a PPB bull rush. They ordered us to disperse to the south, but PPB had formed a riot line to the south. I recall thinking that it seemed like PPB were unfamiliar with cardinal directions or with the area of the precinct.

10. During the rush I was pushed back behind another police line that had formed north on MLK. One of the PPB officers there grabbed my umbrella from me. He looked like he was going to rush me, but then he turned and walked away instead, and I was able to leave the area and started moving west with a group of other protesters.

11. Then PPB rushed us from behind on a dimly lit residential street. I moved as fast as I could in the direction PPB was pushing us but apparently I didn't run fast enough, and I was hit from behind with a baton. I flew forward and landed on my wrists and knees. I was in shock. Another protester picked me up and carried me over their shoulders as we tried to continue running west. 12. By this point the PPB bull rush had largely dispersed the protest, and people were

attempting to leave the area by walking down side streets.

13. I was walking with a very small group east toward where my car was parked behind the precinct when I saw lights coming toward us. Other people started yelling that the police were coming again, and I realized that there was another PPB bull rush charging directly at our small group. We ran for a long time toward the vicinity of Williams Ave, at which point the police were still following us.

14. I was unable to move quickly enough and was again hit from behind by a PPB officer. I was thrown over and through the other protesters before landing on the ground. My knees, arms, and palms were shredded and I was bleeding everywhere. I was eventually able to get up and began hobbling away to the south, the direction we were originally ordered to move in by PPB.

15. We encountered more police in front of us to the south.

16. A PPB officer stopped and looked directly at me, then hit me with his baton using a hard shoving motion with both arms. He struck me on the chest and shoulder, and I was again pushed to the ground.

17. To the best of my knowledge, the officers who used force against me were Portland Police Bureau, they were wearing uniforms that looked like PPB.

18. I was able to find some protest medics not far away who helped to bandage my hand and provide first aid for some of my other injuries.

19. The protest was entirely dispersed, and I made my way back to my car.

20. I was able to drive home, but my body had already begun to ache with intense pain.

21. After a few days, I realized that the pain was not subsiding and I saw a doctor, who performed an x-ray and told me that my collar bone had been broken. The doctor gave me an arm brace and instructed me not to use my arm. I had a number of follow-up appointments to make sure I was healing alright. I was unable to participate in protests at all during my initial

recovery from these injuries.

22. After these experiences of PPB's use of force, I now suffer from extreme PTSD, a worsening hand tremor, and terrible nightmares. I experience episodes of dissociation and tremors at unpredictable intervals. A lot of the past year has felt blurred together, and my dissociation sometimes makes me feel like I am strenuously pretending to be myself in social situations. My physical injuries still have not entirely healed and continue to interfere with my day-to-day activities, and to make my work as a bar tender difficult and painful.

23. I would say that my experience with PPB's use of force that night changed my level of engagement with protests. I mostly participate in daytime protests now, and even those can be quite difficult for me. I do not think I will ever be able to participate again in protests which happen to take place after dark.

24. I felt violated by PPB's use of force against me in many senses: I felt physically violated, that my civil liberties had been violated, that my right to speak had been taken from me by force. I did nothing criminal or violent, I was not arrested or detained. You're supposed to be able to express dissent against police and government malfeasance in a democracy, and I found it shocking how PPB took that away from me and others in such a horrendous and violent way.

25. PPB unleashed indiscriminate force against so many people who were protesting to make a statement, in part against exactly that kind of police brutality. PPB's actions seem fundamentally antidemocratic to me. I have stayed somewhat active but have also felt unable to sustain my involvement in many protest-related activities as a result of these experiences with PPB's use of force.

26. Here are photographs of my injuries from that night:



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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on January 11, 2022


Muriel Lucas (Jan 11, 2022 15:17 PST)

MURIEL LUCAS